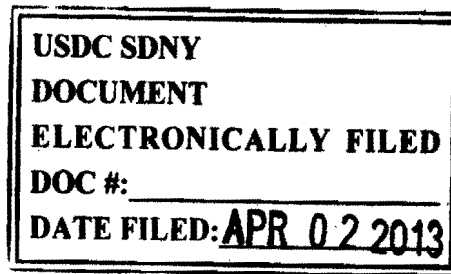


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April 1, 2013

VIA E-MAIL

Hon. Katherine B. Forrest
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: TechnoMarine S.A. v. Jacob Time, Inc., No. 12 Civ. 0790 (KBF)

Dear Judge Forrest:

As the Court is aware, this firm has been retained by Timeworks International, Inc. ("Timeworks") in connection with the above-captioned matter. I write because I recently learned that Plaintiff TechnoMarine SA ("TechnoMarine") has filed a motion seeking to amend the complaint to add Timeworks, among others, as a defendant in this action.

This firm will likely seek the Court's permission to appear in this action for the limited purpose of opposing TechnoMarine's motion. Some of the reasons that Timeworks believes TechnoMarine cannot state a claim against it as a matter of law were previewed in a letter to the Court dated March 14, 2013 from Akiva Shapiro, the attorney at this firm who had been handling the matter. However, Mr. Shapiro did not have the benefit of reviewing TechnoMarine's motion at the time he sent that letter, and we believe that the Court may benefit from a more thorough consideration of the issues that full briefing on the merits of the proposed amendment will allow.

Unfortunately, TechnoMarine's motion and proposed Third Amended Complaint were only provided to Mr. Shapiro by counsel for defendant Jacob Time, Inc., while Mr. Shapiro was out of the country, late on the afternoon of March 25 in Israel, just as the holiday of Passover was about to begin. Mr. Shapiro is a Passover observer, and he will not have access to email or voice mail until the evening of Tuesday, April 2. In addition, all of the principals at Timeworks are Passover observers, so we have been unable to discuss the motion with any of them, and we do not expect to be able to do so until Wednesday, April 3. My understanding is that oppositions to TechnoMarine's March 25 motion are currently due two days later, this coming Friday, April 5. If Timeworks is forced to provide a response to TechnoMarine's motion on this short timetable, with only two days to consult with both our client and the attorney who has been chiefly responsible for this matter, Timeworks will not have sufficient time to consider whether it wishes to assert a defense to this motion and prepare opposition

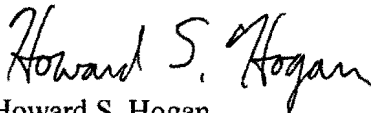
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April 1, 2013
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papers, and then would likely be prejudiced. Given the Court's March 18 order refusing to extend discovery, moreover, we had thought it unlikely that TechnoMarine would attempt to bring new third parties into this action at this stage until we learned that TechnoMarine's motion had been filed.

Under these circumstances, we respectfully request that Court grant a brief, one week extension of the deadline for Timeworks to file a notice of appearance and papers in opposition to TechnoMarine's March 25 motion to amend the complaint. If granted, Timeworks would file these papers no later than Friday, April 12. I have reached out to counsel for TechnoMarine, but they have not yet returned the phone message that I left this morning. Counsel for Jacob Time has confirmed that it has no objection to the brief extension sought.

Respectfully submitted,


Howard S. Hogan

cc: Brent Blakely, Esq.
Cindy Chan, Esq.
William L. Charron, Esq.

Order
Application to submit
papers by 4/12/13
granted.

4/2/13

K B. Forrest
USDJ